

TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman
Lynn Greer, Director
Melvin Malone, Director



460 James Robertson Parkway
Nashville, Tennessee 37243-0505

November 14, 2001

Guy Hicks, General Counsel
BellSouth Telecommunications, Inc.
333 Commerce St., Suite 2101
Nashville, Tennessee 37201-3300

RE: Docket # 99-00662

Dear Mr. Hicks:

To assist the Authority in its review of the Petition of MCI WorldCom, Inc. to Enforce Interconnection Agreement with BellSouth Telecommunications, Inc., BellSouth is requested to provide the information included in the attachment.

Please provide this information by November 21, 2001. If you have any questions concerning this request or need additional information, please call Patsy Fulton at 615-741-2904 ext. 193.

Sincerely,

David Waddell, Executive Secretary

Attachment

Cc: Henry Walker
Docket File

DATA REQUEST
DOCKET No. 99-00662

1. Using the May, 2001 total on the spreadsheet provided by BellSouth as Exhibit RM-1 of Rebuttal Testimony of Richard McIntire, hereinafter referred to as ("Spreadsheet"), please provide the Authority with a usage measurement report in EXCEL format detailing BellSouth's originating traffic terminated on MCI's network in Tennessee.

- Please provide sorted by day, then by Originating NPA/NXX/XXXX order, all calls originating from BellSouth and terminating on MCI's network for the month of May 2001.
- Subtotal each NPA/NXX and at the end of each day and total at the end of the month.
- The report should be provided in the following column format:

	Originating	Location	Terminating	Location	Minutes		
Date	NPA/NXX/XXXX	County	NPA/NXX/XXXX	County	of use	Rate	Revenue

2. Pursuant to a letter e-mailed to Mr. Marcel Henry from Mr. Jerry Hendrix, dated July 16, 2001, (Attachment E of Direct Testimony of Dan Aronson), BellSouth adjusted the payment to MCI to reflect the correct PLU by \$3.5M as calculated by BellSouth. How did BellSouth calculate the \$3.5 M? Please provide exact details of how the PLU percentage as well as the \$3.5 M were calculated. How many minutes were used in the calculation and at what rates? Submit a prepared spreadsheet for clarification with details by month that totals to the 3.5M.
3. MCI reported 68,635,549 of Intrastate usage and BellSouth reported 17,555,872 of IntraLATA MOU's on the spreadsheet. Explain the difference.
4. Please provide a usage report in EXCEL format of intrastate MCI traffic for Tennessee in the following column format:

	Originating	Location	Terminating	Location	Minutes	Rate	Revenue
Date	NPA/NXX/XXXX	County	NPA/NXX/XXXX	County	of Use		

This report should be provided in day order, then by originating NPA/NXX/XXXX number order. Subtotal the minutes by day and total at the minutes for the month of May, 2001 confirming that totals match that of the Spreadsheet.

5. How did BellSouth arrive at the number of intraLATA minutes on the Sreadsheet. If PLU was used, provide calculations justifying the PLU used.

6. BellSouth deducted \$1,000,000 due to the difference of 166,000,000 in minutes of use as reported by BellSouth vs MCI. How did BellSouth calculate the \$1,000,000 in usage charges? Please provide an EXCEL spreadsheet containing details of calculation totaled by month.
7. Please provide an EXCEL spreadsheet supporting the calculation of the \$700,000 paid to MCI including the tariffed intraLATA rates used in the calculation of the payment, as discussed in the e-mail to Mr. Marcel Henry on July 16, 2001 from Jerry D. Hendrix. Please include minutes of use by month.
8. Please submit all customer numbers of BellSouth end-users, that "subscribe to an extended area plan" that are involved in this dispute. Please sort in NPA-NXX-XXXX numerical order.